Notice Concerning Proposed Kansas Air Quality
Construction Permit and Public Hearing

Notice is hereby given that the Kansas Department of Health and Environment (KDHE) is soliciting comments regarding a proposed air quality construction permit. Next Generation Processing, LLC. (NGP), located at 15914 Stenbury Court, Cypress, TX 77429, has applied for an air quality construction permit in accordance with the provisions of K.A.R. 28-19-300 to construct the Haven Gas Plant, a 1.40 billion standard cubic feet per day cryogenic natural gas processing facility, to be located in Section 6, Township 25 South, Range 4 West near Haven, Reno County, Kansas. The facility will consist of two (2) natural gas fired combined cycle turbines, each rated at 29,299 HP, with one compressor each, for natural gas compression and plant re-compression; one (1) natural gas fired turbine generator set, rated at 40.27 MMBtu/hr; two (2) natural gas fired reciprocating engine generator sets, each rated at 1,980 HP; one (1) amine unit, with a design capacity of 650 gallons per minute; one (1) mol sieve dehydrator with a capacity of 1.40 billion standard cubic feet per day; one (1) demethanizer unit in the cryogenic expander; and four (4) electric compressors for plant compression and recompression of natural gas.

Emissions of particulate matter (PM), PM equal to or less than 10 microns in diameter (PM_{10}), PM equal to or less than 2.5 microns in diameter ($PM_{2.5}$), volatile organic compounds (VOCs), oxides of nitrogen (NO_x), sulfur dioxide (SO_2), carbon monoxide (CO), hazardous air pollutants (HAPs) and greenhouse gases (GHGs) were evaluated during the permit review process. The proposed permit is to be issued in accordance with the provisions of K.A.R. 28-19-350, *Prevention of Significant Deterioration* (PSD) which adopt the federal standards, procedures and requirements of 40 CFR 52.21 by reference. These air quality regulations apply to major stationary emission sources located in areas designated as "attainment" or "unclassifiable" under the federal Clean Air Act (CAA). Attainment areas are areas where the air quality meets or is better than the national ambient air quality standards (NAAQS). Unclassifiable areas are areas where the air quality cannot be classified on the basis of available information as meeting or not meeting the NAAQS.

The PSD regulations require evaluation of emission reduction techniques to identify the best available control technology (BACT) for each regulated pollutant, including greenhouse gases (GHGs), for which the emission rate exceeds the PSD significant level. The purpose of BACT is to affect the maximum degree of reduction achievable, taking into account energy, environmental and economic impacts for each regulated pollutant under review. Evaluation of the estimated emissions for the proposed NGP project indicates that the emission rate of NO_x, O_3, CO, $PM_{2.5}$, and GHGs all exceed the significance levels. NGP conducted the required BACT analyses. The department has reviewed NGP's BACT analyses and concurs with its findings.

> BACT for the two (2) 29,299 HP combine cycle turbines, is as follows: dry low NO_x technology, good combustion practices, energy efficient design, waste heat recovery, and firing pipeline natural gas is BACT for NO_x; good combustion practices, energy efficient design, waste heat recovery and firing pipeline natural gas is BACT for CO, $PM_{2.5}$ and GHG emissions.

BACT for the one (1) 40.27 MMbtu/hr turbine generator set, is as follows: dry low NO_x technology, good combustion practices, energy efficient design, and firing pipeline natural gas is BACT for NO_x; good combustion practices, energy efficient design, and firing pipeline natural gas is BACT for CO, $PM_{2.5}$ and GHG emissions.

BACT for the two (2) 1,980 HP reciprocating engine generator sets, is as follows: Dual Non-Selective Catalytic Reduction (NSCR) three-way catalytic converters, good combustion practices and firing pipeline natural gas is BACT for NO_x; Dual Non-Selective Catalytic Reduction (NSCR) three-way catalytic converters, good combustion practices, and firing pipeline natural gas is BACT for CO; good combustion practices, energy efficient design, and firing pipeline natural gas is BACT for $PM_{2.5}$ and GHG emissions.

BACT for the one (1) amine unit still vent is as follows: Waste heat recovery from the turbines for Amine regeneration is BACT for GHG emissions.

BACT for plant fugitives and equipment leaks is as follows: An effective Leak Detection and repair (LDAR) program is BACT for GHG emissions.

An ambient impact analysis was performed on the potential air emissions of NO_2, $PM_{2.5}$, and CO from this project.

- A preliminary modeling analysis conducted for the annual NO_2 averaging period demonstrated no significant impact to the annual NO_2 ambient air quality standard and demonstrated that 1.3% of the annual Class II maximum allowable increment for NO_2 is expected to be consumed. A preliminary modeling analysis for the 1-hour NO_2 ambient air quality standard demonstrated no significant impact to the 1-hour NO_2 ambient air quality standard. EPA has not established a 1-hour Class II maximum allowable increment for NO_2. Accordingly, no calculation of the potential consumption of such increment is possible.
- A preliminary modeling analysis conducted for the annual $PM_{2.5}$ averaging period demonstrated no significant impact to the annual $PM_{2.5}$ ambient air quality standard and that 2.0% of the annual Class II maximum allowable increment for $PM_{2.5}$ is expected to be consumed. A preliminary modeling analysis conducted for the 24-hour $PM_{2.5}$ ambient air quality standard demonstrated no significant impact to the 24-hour $PM_{2.5}$ ambient air quality standard and that 6.4% of the 24-hour Class II maximum allowable increment for $PM_{2.5}$ is expected to be consumed.
- A preliminary modeling analysis conducted for the 8-hour CO averaging period demonstrated no significant impact to the 8-hour CO ambient air quality standard. A preliminary modeling analysis conducted for the 1-hour CO averaging period demonstrated no significant impact to the 1-hour CO ambient air quality standard. EPA has not established any Class II maximum allowable increments for CO. Accordingly, no calculation of the potential consumption of such increment is possible.

An analysis of visibility was conducted for Hercules Glades Wilderness Area in southwestern Missouri and Haven High School. The VISCREEN model results indicate no exceedances of the screening criteria. No adverse impacts on soils and vegetation in the area are expected. Any federal land manager who has reason to believe they may have a federal class I area adversely impacted by the emissions from the proposed project has the opportunity to present KDHE with a demonstration of the adverse impact on the air quality-related values of the federal class I area during the comment period.

A public comment period has been established to allow citizens the opportunity to express any concerns they may have regarding this proposed permitting action. The public comment period is to begin on October 4, 2012, and will end on November 5, 2012, at 5:00 PM. All comments should be submitted in writing to Sharon Burrell, Bureau of Air, 1000 SW Jackson, Suite 310, Topeka, KS 66612-1366.

> Any member of the public may request the Department to hold a public hearing to receive comments on the proposed issuance of the draft air quality construction permit. Written request to hold a public hearing should be sent to the attention of Ms. Sharon Burrell at the address listed above or by FAX to (785) 291-3953 and must be received by 5:00 PM on November 5, 2012. A public hearing is tentatively scheduled by the Kansas Department of Health and Environment (KDHE), on November 8, 2012, at 5:00 p.m., until all verbal and/or written comments have been submitted by participants, at the City of Haven Community Building, 215 SW Reno, Haven, KS 67543. **If no pertinent requests to hold the public hearing are received by 5:00 PM November 5, 2012, the public hearing will be cancelled. A notice of the cancellation will be posted at the KDHE website at http://www.kdheks.gov/bar/publicnotice.html**

If a hearing is conducted, all interested parties will be given a reasonable opportunity to present their views orally or by submission of written materials during the hearing. In order to give all parties an opportunity to present their views, it may be necessary to request that each participant limit oral presentations to a specific time limit.

Any individual with a disability may request accommodation in order to participate in the public hearing and may request the proposed materials in an accessible format. Requests for accommodation must be made no later than October 25, 2012, by contacting Sharon Burrell at (785) 296-0297.

A copy of the proposed permit, permit application, all supporting documentation, and all information relied upon during the permit application review process for the PSD are available for public review for a period of 30 days from the date of publication during normal business hours (8:00 AM to 5:00 PM) at the KDHE, Bureau of Air (BOA), 1000 SW Jackson, Suite 310, Topeka, KS 66612-1366. A copy of the proposed permit and all supporting documentation can also be reviewed at the KDHE South Central District Office, 130 South Market, Suite 6050, Wichita, KS 67202-3802. To obtain or review the proposed permit and supporting documentation, contact Lynelle Ladd, (785) 296-1719, at the KDHE central office, or David Butler, (316) 337-6042, at the KDHE South Central District Office,. The standard departmental cost will be assessed for any copies requested.

These same materials are available, free of charge, at the KDHE Bureau of Air Public Notice website, **http://www.kdheks.gov/bar/publicnotice.html**

Robert Moser, MD, Secretary
Kansas Department of Health and Environment